

**IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

FRANK SACCA,)	
)	
Plaintiff,)	Hon. Judge Thomas M. Durkin
)	
v.)	Hon. Mag. Judge Sidney I. Schenkier
)	
WYOMING WHISKEY, INC.,)	
BRADFORD MEAD, KATHERINE MEAD,)	
and DAVID DEFAZIO,)	Case No. 1:17-cv-8298
)	
Defendants.)	

UNOPPOSED MOTION FOR LEAVE TO FILE DOCUMENT UNDER SEAL

Defendants, WYOMING WHISKEY, INC., BRADFORD MEAD, KATHERINE MEAD, and DAVID DEFAZIO, by and through their attorneys of record, Reno & Zahm LLP, hereby move this Court for an order granting Defendants' Leave to File Documents Under Seal pursuant to Local Rule 26.2(c), and in support thereof, Defendants state and allege as follows:

1. Plaintiff's Complaint makes numerous allegations relating to Plaintiff's employment with Defendant Wyoming Whiskey ("Wyoming Whiskey").
2. Plaintiff's Complaint and Defendants' Motion to Dismiss (filed simultaneously with this Motion) rely upon the language of Plaintiff's Employment Agreement with Wyoming Whiskey, which was referenced, but not attached to, the Complaint.
3. The Employment Agreement contains confidential information including personal income information and trade secrets such as distribution, sales, and marketing plans. See *Methodist Hosps., Inc. v. Sullivan*, 91 F.3d 1026, 1031 (7th Cir. 1996) (stating that personal income is one of the categories of information that can be withheld from the public under seal); *Pepsico, Inc. v. Redmond*, 46 F.3d 29, 31 (7th Cir. 1995) ("Legitimate trade secrets should be protected from disclosure."); *Triumph Packaging Group v. Ward*, 834 F. Supp. 2d 796, 806 (N.D. Ill. 2011)

(“Trade secrets include ‘customer lists that are not readily ascertainable, pricing, distribution, and marketing plans, and sales data and market analysis information.’”).

4. Further, Section V.C of the Employment Agreement requires that, in the event of litigation, the parties must maintain the secrecy of all documents to protect Defendants’ Confidential Information.

5. Defendants have provisionally filed the Employment Agreement under seal electronically with the Court, pursuant to Local Rule 26.2(c).

6. The undersigned counsel has conferred with counsel for Plaintiff prior to filing this Motion and counsel for Plaintiff has no objections to this Motion.

7. For all of these reasons, this Court should permit the Employment Agreement to be filed under seal pursuant to Local Rule 26.2(c).

WHEREFORE, Defendants, WYOMING WHISKEY, INC., BRADFORD MEAD, KATHERINE MEAD, and DAVID DEFAZIO, respectfully request that this Court enter an Order granting their Motion for Leave to File Document Under Seal and for such other relief as the Court deems just and proper.

Dated this 27th day of November, 2017.

RENO & ZAHM LLP

By: /s/Jeffrey H. Powell

Jeffrey H. Powell, Attorney for Defendants
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CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a copy of the **Unopposed Motion for Leave to File Document Under Seal** was electronically served upon the registered CM/ECF users and via electronic mail service upon any non-registered CM/ECF users in the above-entitled case on this 27th day of November, 2017.

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